

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - FLINT**

IN THE MATTER OF:

TOD CARON
LAURA CARON,

Debtors.

Case No. 14-32151-DOF
Honorable DANIEL S. OPPERMAN
Chapter 13

3414 Sandy Shore Drive
Metamora, MI 48455
XXX-XX-5161
XXX-XX-4257

**OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN
ON BEHALF OF FORD MOTOR CREDIT COMPANY LLC**

Creditor Ford Motor Credit Company LLC ("Objector") by and through counsel, KILPATRICK & ASSOCIATES, P.C., states:

1. The Debtors ("Debtor" as used herein shall include both Debtors in a joint case) filed a voluntary Chapter 13 petition on July 30, 2014.
2. On the Petition Date the Debtor was indebted to Objector in the amount of \$14,702.50 (plus interest, fees and costs) and in possession of the following: 2010 Ford F150 (VIN: 1FTFW1EVXAF48333) (Acct. No.: 4984) (the "Vehicle").
3. The Vehicle listed in Paragraph 2 was purchased on a Retail Installment Sale Contract (the "Contract").
4. The Proposed Plan cannot be confirmed for the following reasons:
 - (a) The Proposed Plan fails to pay the present value of the Vehicle as required by 11 U.S.C. § 1325(a)(5)(B)(ii) because:
 - (i) The Proposed Plan states an incorrect value for the Vehicle. The approximate value of the Vehicle is \$24,225.00 based on the NADA Official Used Car Guide.
 - (b) The Objector is not adequately protected pursuant to 11 U.S.C. §1326 as:
 - (i) The Debtor has failed to remit adequate protection payments to Objector as required by 11 U.S.C. §1326(a) (1).

WHEREFORE, Ford Motor Credit Company LLC requests the Court to deny confirmation of the Proposed Plan, and to grant such other relief as may be appropriate and just.

Respectfully submitted,

KILPATRICK & ASSOCIATES, P.C.

By: /s/ Kristy Steffani

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